

Koch, Kristine

From: Koch, Kristine
Sent: Thursday, July 11, 2013 11:55 AM
To: James McKenna; Gene Revelas; Sandy Browning
Cc: 'Jennifer Woronets'; Allen, Elizabeth; Bill Locke
Subject: RE: Upriver data set

Jim – Yes, Elizabeth needs to be on the call. I'd like to get this figured out as soon as possible. This is taking way too long and we need to finish this section of the RI, which hinges on the data set. Elizabeth and I are both available this afternoon. I'm available after 11 on Monday.

Regards,

Kristine Koch
Remedial Project Manager
USEPA, Office of Environmental Cleanup

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From: James McKenna [mailto:jim.mckenna@verdantllc.com]
Sent: Thursday, July 11, 2013 11:42 AM
To: Koch, Kristine; Gene Revelas; Sandy Browning
Cc: 'Jennifer Woronets'; Allen, Elizabeth; Bill Locke
Subject: RE: Upriver data set

Kristine:

I just spoke with Gene and we agree that a phone call would be good to discuss both the historical agreements (e.g., why the LWG did things the way we did in the 2011 Final Draft RI), as well as resolving the most prudent approach for moving forward (obviously, this is the most important issue!).

We currently have a call scheduled with you for noon tomorrow, however Gene will still be on the east coast and my Friday schedule is getting pretty crazy. Can we reschedule for Monday? Gene and I are available any time after 10:00am. Also, do you want to include Elizabeth on this call since she has some questions about the upstream/background data sets? If so, let us know and Jen will add her to the invite list.

Thanks! Jim.

From: Koch, Kristine [mailto:Koch.Kristine@epa.gov]
Sent: Thursday, July 11, 2013 11:22 AM
To: Gene Revelas; Sandy Browning; James McKenna
Cc: 'Jennifer Woronets'; Allen, Elizabeth; Bill Locke
Subject: RE: Upriver data set

I'm not sure by what you mean about honoring a 2008 lockdown date. That date was for the original draft RI and EPA maintained that the additional data in Appendix H was to be included in the RI (this includes background, if applicable – meaning if there are any QA2 data points). The background data set needs to include all QA2 data points from the

upstream data set (RM 15.3 and above). If there were no QA2 data added in the revised draft RI (2011), then the original data set for background is complete; otherwise it needs to be updated.

Further, I was not aware that the upriver data and background data were summed differently – I knew that the background and study area data were calculated differently.

Elizabeth's issue is that the 2009 background data (from Portal) and the current (2013) data set sent by Integral seems to have the same data points, but different values representing those data points. The values should be the same, so what happened? Were the 2009 data summed incorrectly or were the 2013 data summed incorrectly.

I agree we need to talk.

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From: Gene Revelas [<mailto:grevelas@integral-corp.com>]

Sent: Thursday, July 11, 2013 11:11 AM

To: Koch, Kristine; Sandy Browning; 'James McKenna'

Cc: 'Jennifer Woronets'; Allen, Elizabeth; Bill Locke

Subject: RE: Upriver data set

Hi Kristine –

Yes, and I was just about to hit send on this email which provides some additional details on differences between the data sets.

The differences between the upriver (Appendix H) and background (Section 7) datasets relate to specific data selection and handling procedures for the background analysis that the LWG and EPA jointly identified and agreed to when the background approach was developed in 2008 and early 2009, leading up to the 2009 draft RI Report, as outlined below. We also have a clarification question about Elizabeth's July 9th email.

The key differences between the criteria/rules used to define upriver and background datasets include:

- 1) different data quality category thresholds (all Cat 1 data for RI Section 5/Appendix H upriver versus only Cat1 QA2 data for RI Section 7 background)
- 2) different summing rules for totaled parameters (RI summing rule for upriver versus RA summing rules for background),

EPA and the LWG agreed in 2008 that the background data set to be presented in Section 7 of the Draft and Revised RI would differ from the other RI data sets and would be developed using the risk assessment data quality and summing rules, noted above, in order to make the background numbers comparable to the risk-based PRGs.

An additional important difference in the upriver and background data sets is a result of our recent agreement (i.e., June 2013) to combine the Appendix H upstream data with the main RI data set as part of the on-going RI revision. The City's

2008 downtown reach sampling included data from 5 locations above RM 15.3 (from RM 15.4 to 15.8) that were included in Appendix H of the 2011 Draft Final RI (July 2010 lockdown date) but were not included in the main RI report data set and so were not included in the background data set, which honors the June 2008 data lockdown date. In recent weeks, we have combined the Appendix H and main RI data sets, so these locations now fall within the upriver dataset but are not part of the background dataset.

With respect to Elizabeth's July 9th email, when she writes: "there may be a "summing rule" issue with respect to the PCB data presented in the 2009 data set that was posted on the portal site"? Is this referring to the 2009 background data set or the full RI data set?

We feel a conference call to discuss this topic further would be the most effective and expedient path forward.

Thanks,

Gene

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HEALTH ENVIRONMENT TECHNOLOGY SUSTAINABILITY

From: Koch, Kristine [<mailto:Koch.Kristine@epa.gov>]
Sent: Thursday, July 11, 2013 2:03 PM
To: Koch, Kristine; Sandy Browning; James McKenna; Gene Revelas
Cc: 'Jennifer Woronets'; Allen, Elizabeth
Subject: RE: Upriver data set

Since I have not heard a response, may I postulate that it is because EPA Policy (OSWER 9285.3-07P) states that the role of background in the CERCLA Cleanup Program is for risk characterization (RI) and risk management (FS). Since only QA2 data is used in the baseline risk assessment, this is the data that will be used to develop background.

All agreed?

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From: Koch, Kristine
Sent: Wednesday, July 10, 2013 8:11 AM
To: 'Sandy Browning'; James McKenna; Gene Revelas
Cc: 'Jennifer Woronets'; Allen, Elizabeth
Subject: RE: Upriver data set

Why?

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From: Sandy Browning [<mailto:sbrownning@integral-corp.com>]
Sent: Tuesday, July 09, 2013 11:52 AM
To: Koch, Kristine; James McKenna; Gene Revelas
Cc: 'Jennifer Woronets'; Allen, Elizabeth
Subject: RE: Upriver data set

All:

The database selection criteria for the “Upriver” and “Background” data sets were not the same. In Section 5, we present results for Upriver samples which overlap but are not the same as the Background data set because the Upriver data set includes Category 1 QA1 & QA2 data and limits the samples to those collected below +13 ft. The Background data set uses Category 1 QA2 data only.

Data Type	Primary Sources/Data Quality Selection	Additional Inclusion or Exclusion Criteria
Sediment	LWG and Other Parties/Category 1 QA1 or Category 1 QA2 collected since May 1, 1997; see Table 2.0-1	<ul style="list-style-type: none">- Include samples collected from an elevation below or equal to +13 ft NAVD88^a- Exclude Ross Island Lagoon samples from Downtown Reach- Exclude sediment samples subsequent dredged or capped from summary statistics but include in figures and maps with flags
Sediment - Background	LWG and Other Parties/Category 1 QA2	<ul style="list-style-type: none">- Include surface sediment (0–30 cm)- Include samples collected from RM 15 to 24.8

Let me know if you have any other questions.

Sandy
360.705.3534, ext. 413

From: Koch, Kristine [<mailto:Koch.Kristine@epa.gov>]
Sent: Tuesday, July 09, 2013 10:53 AM
To: James McKenna; Gene Revelas
Cc: 'Jennifer Woronets'; Allen, Elizabeth; Sandy Browning
Subject: RE: Upriver data set

Jim – Here is the discrepancy. Table H4.2-1 shows that there are 81 total Aroclor samples, 26 congener samples, and 81 total PCB samples. The data set sent to EPA for Section 7 has 67 total Aroclor samples and 33 total congener samples.

These two data sets should be the same. Further, the values seem quite different between the two...just looking at max values, Table H4.2-1 has a max total Aroclor value of 30.9, but the background data set has a max value of 53.45; Table H4.2-1 has a max total congener value of 31, but the background data set has a max value of 47.8 (the 2009 data set for background had a max value of 47.975 for the same sample location – WLFLH07WR08SD). This is only for PCBs...we haven't looked at the other COIs.

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From: James McKenna [<mailto:jim.mckenna@verdantllc.com>]
Sent: Tuesday, July 09, 2013 10:07 AM
To: Koch, Kristine; Gene Revelas
Cc: 'Jennifer Woronets'; Allen, Elizabeth
Subject: RE: Upriver data set

Good morning Kristine. Yes, I would like to discuss this with you ASAP. Can you provide a bit more detail regarding the discrepancy you are seeing so Gene and I can research it before talking with you? Thanks, Jim.

From: Koch, Kristine [<mailto:Koch.Kristine@epa.gov>]
Sent: Tuesday, July 09, 2013 10:03 AM
To: James McKenna; Gene Revelas
Cc: 'Jennifer Woronets'; Allen, Elizabeth
Subject: Upriver data set

Jim – there seems to be some discrepancy between the information in the RI Section 5 regarding the upriver data set and the information provided by Integral for Section 7 background data set. I'd like to reconcile this issue as quickly as possible. Please let us know if you need to discuss.

Regards,

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